

EXHIBIT

16

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
INC., *et al.*,

Plaintiffs,

v.

CITY OF MYRTLE BEACH, *et al.*,

Defendants.

Civil Action No. 4:18-cv-00554-MGL

DECLARATION OF WILLIAM MCNEILL

I, William McNeill, hereby state as follows:

1. I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth herein.
2. I served in the military before retiring in Humble, Texas. I am African American.
3. I have been attending Black Bike Week regularly for about 20 years.
4. I have been riding a motorcycle since I was a young, and Black Bike Week is an annual vacation that I look forward to all year. I love Bike Week for the chance to get away, see my family, my friends, and to meet and spend time with other black bikers.
5. Black Bike Week is more than just a rally. It's a car show, a bike show, a fashion show, and a beach vacation. I know attendees who work on their bikes all year just to show them off on Ocean Boulevard during Bike Week. The chance to gather together, show off your work on your bike, and meet new friends in the community means that people come from all over. I have a beach 45 minutes away from my home, but I drive 18 hours to attend Bike Week.

6. In 2013 I attended Bike Week, and like many other years it was a lot of fun. Ocean Boulevard wasn't restricted like it is now, and I could ride my bike around the city, meet friends, and admire other bikes and cars.

7. After 2013, I worked overseas and could not attend Bike Week for a few years. When I returned to Black Bike Week in 2017, I was disappointed to find a one-way traffic pattern on Ocean Boulevard and a traffic loop that was so restrictive that I had to walk rather than ride my bike. Traffic was so crowded it took exponentially longer to get anywhere, and I spent a lot of the weekend waiting around or fighting traffic to try to meet up with friends.

8. Even though the City says the loop is supposed to help traffic, I've experienced more traffic, not less, as a result of the loop.

9. On top of the gridlock caused by the new traffic plan, the most upsetting part about the loop is that it is not used during Harley Week.

10. I attended Harley week in 2013 and 2017 and observed the differential treatment between the two May bike weeks. In 2017 during Harley Week, I was able to cruise up and down Ocean Boulevard without one-way streets or the standstill caused by the traffic loop. I could also get where I wanted to go and socialize with bikers and friends much more freely. I could not do any of that during Black Bike Week.

11. I've also seen a big difference in the way law enforcement treats bikers between the two weekends. During Harley Week in 2017, I saw bikers doing burnouts and donuts in the middle of the street and law enforcement taking videos of them, entertained by it. I know during Black Bike Week, you'd get a ticket for that. When black bikers come, there are so many more police officers and they seem to be enforcing even small infractions more aggressively. The tone is completely different.

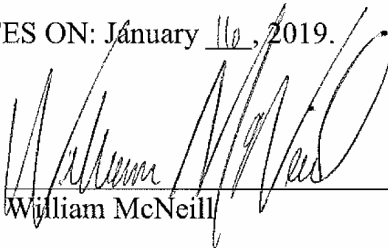
12. The loop, the one-way traffic, and the extreme police surveillance made 2018 the worst Black Bike Week I have ever attended. Myrtle Beach makes it blatantly clear that they don't want us there. We, as black bikers, are aware that we are not welcome.

13. As a result, it seems like attendance at Black Bike Week has dwindled in recent years because the City has effectively taken the enjoyment out of this annual gathering. After roughly twenty years of coming to Black Bike Week, I'm now considering taking my vacation with my friends and family elsewhere. It is no longer worth an 18-hour drive to visit a place where I am made to feel unwelcome and treated differently than the white Harley bikers.

14. I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED WITHIN THE UNITED STATES ON: January 16, 2019.

BY:


William McNeill